

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

Office of Commercial Space Transportation

Adoption of the Environmental Assessment

and

Finding of No Significant Impact

for

Space Florida Launch Site Operator License and Vehicle Operator

Licenses at Cape Canaveral Space Force Station Space Launch Complex 20

Summary

The U.S. Air Force (USAF)¹ acted as the lead agency, and the Federal Aviation Administration (FAA) was a cooperating agency, in the preparation of the October 2020 *Environmental Assessment for the Reconstitution and Enhancement of Space Launch Complex 20 Multi-User Launch Operations at Cape Canaveral Air Force Station², Florida* (EA), which analyzed the potential environmental impacts of the USAF transferring property, including Space Launch Complex 20 (SLC-20), to Space Florida to develop a multi-user launch site at SLC-20. Space Florida’s proposal includes refurbishing and enhancing an existing launch pad and offering the launch site to commercial operators of small- and medium-lift launch vehicles. In addition to construction, the EA analyzed the impacts of up to 24 launches per year. The EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA; 42 United States Code [U.S.C.] § 4321 et seq.); Council on Environmental Quality NEPA implementing regulations (40 Code of Federal Regulations [CFR] Parts 1500–1508)³; USAF’s Environmental Impact Analysis Process (32 CFR Part 989); and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*. The USAF signed a Finding of No Significant (FONSI) on October 28,

¹ The U.S. Air Force prepared the NEPA document prior to establishment of the U.S. Space Force. This FONSI continues to refer to USAF as the lead agency for the Proposed Action.

² Following the establishment of the U.S. Space Force, Cape Canaveral Air Force Station was renamed Cape Canaveral Space Force Station on December 9, 2020.

³ CEQ’s amended regulations implementing NEPA took effect on September 14, 2020. Agencies have discretion to apply the amended regulations to NEPA processes that were begun before September 14, 2020 (40 CFR § 1506.13). The USAF initiated the NEPA process for this action in 2019, prior to CEQ’s notice of proposed rulemaking (85 FR 1684). Therefore, the prior CEQ regulations apply to this NEPA process.

2020 based on the EA, which stated that neither the Proposed Action nor the No Action Alternative would individually or cumulatively result in a significant impact to any resources and that an Environmental Impact Statement (EIS) is not warranted.

In order to operate SLC-20 as a commercial space launch site, Space Florida must possess a launch site operator license from the FAA Office of Commercial Space Transportation that includes SLC-20. Additionally, individual launch operators must obtain a vehicle operator license from the FAA to conduct launches at SLC-20. Based on its independent review and consideration of the EA, the FAA issues this FONSI concurring with, and formally adopting, the analysis of impacts and findings in the EA pertaining to the operation of SLC-20 under an FAA launch site operator license and the issuance of vehicle operator licenses to commercial launch operators for launches at SLC-20. If, in their license applications to the FAA, Space Florida or individual launch operators propose operations that fall outside the scope of the EA, additional environmental review will be required prior to the FAA issuing a license.

After reviewing and analyzing available data and information on existing conditions and potential impacts, including the EA, the FAA has determined that Space Florida's proposed operation of SLC-20 under an FAA launch site operator license and the proposed issuance of vehicle operator licenses to commercial launch operators for launches at SLC-20 would not significantly affect the quality of the human environment within the meaning of NEPA. Therefore, the preparation of an EIS is not required, and the FAA is independently issuing this FONSI. The FAA has made this determination in accordance with applicable environmental laws and FAA regulations. The EA is incorporated by reference into this FONSI.

For any questions or to request a copy of the EA, contact:

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Purpose and Need

The purpose of Space Florida's proposal is to develop a multi-user commercial space launch site in support of Space Florida's Cape Canaveral Spaceport Master Plan in accordance with Florida statutes.

Specifically, Space Florida must meet current and future commercial, national, and state space transportation requirements through expansion and modernization of space transportation facilities within its spaceport territories. The territories include, but are not limited to, areas within Cape Canaveral Air Force Station (CCAFS). A commercial launch site at SLC-20 would allow commercial launch providers to assemble, process, test, and launch vehicles to meet the demand for lower cost access to space.

Space Florida's proposal is needed to provide a launch site for commercial launch operators to conduct tests and launches in the United States. Space Florida's proposal contributes to meeting the goals of the Space Florida Master Plan consistent with the National Space Transportation Policy, National Aeronautics and Space Administration Space Act Agreement, and Department of Defense policy pursuant to DoD Directive 3230.3.

The FAA expects to receive licensing requests from Space Florida and individual launch operators. The FAA must review each request and determine whether to license the activities.

Proposed Action

The FAA's Proposed Action is to 1) authorize Space Florida to operate SLC-20 as a commercial space launch site under a launch site operator license and 2) issue vehicle operator licenses to commercial launch operators to conduct launches at SLC-20. The Proposed Action includes conducting up to 24 annual launches of small- and medium-lift launch vehicles. The EA used Firefly Aerospace's launch vehicles (called Alpha and Beta) as representative vehicles for analysis. Both representative launch vehicles are expendable and provide satellite delivery services with the future opportunity for lunar surface delivery services. Propellants considered in the EA include liquid oxygen, rocket propellant 1 (RP-1), and liquid methane.

All launch vehicle stages would arrive from the manufacturing facility in Exploration Park via truck and would be placed in the horizontal integration facility for storage. There, the stages would be checked out and prepared for mating. When ready, the encapsulated payload would be mated to the launch vehicle.

Approximately seven days before launch, the launch vehicle would be moved to and connected to the launch stand using an aircraft tug or tractor. The launch vehicle would then undergo an additional series of tests while horizontal or vertical at the pad, such as dress rehearsals and a static fire engine test.

Approximately 20 to 25 people would be involved in launch preparation activities.

After final systems checkout, the launch operator would typically perform a mission rehearsal without propellants on board (referred to as dry dress rehearsal) and a mission rehearsal with propellants loaded on the vehicle (referred to as a wet dress rehearsal) to verify full launch readiness. Two dress rehearsals are typical in the launch preparation schedule to allow for team training and coordination of activities between the launch vehicle operator and the USAF (45th Space Wing [45 SW]). In addition to rehearsals, launch operators may conduct a static fire engine test, which is like a wet dress rehearsal with the addition of engine ignition for up to five seconds.

All launch operations would comply with the necessary notification requirements, including issuance of Notices to Airmen (NOTAMs) and Local Notices to Mariners (NOTMARs), consistent with current procedures. A NOTAM provides notice of unanticipated or temporary changes to components of, or hazards in, the National Airspace System (FAA Order JO 7930.2S, Notices to Airmen). A NOTMAR provides notice of temporary changes in conditions or hazards in navigable waterways. Eastern Range operations (which include the proposed launches from SLC-20) currently follow the procedures stated in a Letter of Agreement (LOA) (dated May 1, 2020) between the 45 SW and FAA. The LOA establishes responsibilities and describes procedures for the 45 SW, Eastern Range operations, within airspace common to the Miami Center, Jacksonville Center, New York Center, San Juan Center Radar Approach Control, Central Florida Terminal Radar Approach Control, NASA Shuttle Landing facility, Fleet Area Control and Surveillance Facility Jacksonville, Air Traffic Control System Command Center, and Central Altitude Reservation Function areas of jurisdiction. The LOA defines responsibilities and procedures applicable to operations, which require the use of Restricted Areas, Warning Areas, Air Traffic Controlled Assigned Airspace, and/or altitude reservations within Eastern Range airspace.

Eastern Range operations also currently follow the procedures stated in a Memorandum of Agreement (MOA) (dated June 2020) between the 45 SW and the U.S. Coast Guard (USCG) for implementing a USCG Space Flight Security Manager for patrol, maritime warning, and administrative assistance in support of space vehicle and missile launches on the Eastern Range. The USCG support mission aids in reducing the hazards to personnel on boats and ships within the 45 SW identified launch hazard areas, thereby increasing the potential for launching on time, while providing security for the space vehicle and surrounding infrastructure. The USCG support also includes broadcasting notice to mariners, bridge closures, and the patrol of limited access areas.

The Proposed Action does not include altering the dimensions (shape and altitude) of the airspace. However, temporary closures of existing airspace and navigable waters would be necessary to ensure

public safety during launch operations. Advance notice via NOTAMS and NOTMARS would assist general aviation pilots and mariners in scheduling around any temporary disruption of flight or shipping activities in the area of operation. Launches would be of short duration and scheduled in advance to minimize interruption to airspace and waterways. For these reasons, the FAA does not anticipate significant environmental impacts from the temporary closures of airspace and waterways, including the issuance of NOTAMS and NOTMARS.

Launch vehicle trajectories would be specific to each mission based on customer needs. All launches are expected to be conducted to the east over the Atlantic Ocean between the allowable azimuths of 44 degrees to the northeast and 110 degrees to the southeast. As part of the licensing evaluation process, the FAA conducts a policy review, payload review, financial determination, and safety review. Space Florida would complete a Flight Safety Analysis as part of its request to operate SLC-20 under a launch site operator license which would include an expected casualty calculation and operational restrictions, and the FAA would evaluate this analysis as part of the safety review to ensure the results meet FAA regulations (14 CFR Chapter III). Each launch operator would also complete a Flight Safety Analysis and define specific trajectories as part of its license application. All approved trajectories are based on specific launch vehicle performance and characteristics and would satisfy FAA regulations.

The 45 SW has jurisdiction over the construction activities discussed in the EA because the construction would occur on CCAFS property. The FAA has no federal action associated with the construction activities. Therefore, this FONSI addresses only those aspects of the activities considered in the EA for which the FAA has regulatory authority, namely operations under a launch site operator license and vehicle operator licenses.

Alternatives

Alternatives analyzed in detail in the EA include (1) the Proposed Action and (2) the No Action Alternative. Under the No Action Alternative, the USAF would not transfer the property discussed in the EA, including SLC-20, to Space Florida. Therefore, SLC-20 would not be developed into a commercial launch site. Accordingly, the FAA would not receive a request from Space Florida to operate SLC-20 as a commercial launch site. Space Florida considered other launch sites to meet its statutory objectives. Space Florida's rationale for dismissing other sites are discussed in EA Section 2.2.2.

Environmental Impacts

The following presents a summary of the potential environmental impacts considered in the EA for the FAA's Proposed Action. This FONSI incorporates the EA by reference and is based on the potential impacts discussed therein. The FAA has determined the analysis of impacts presented in the EA represents the best available information regarding the potential impacts associated with the FAA's regulatory responsibilities as described in this FONSI.

This FONSI analyzes all of the FAA's environmental impact categories except farmlands, natural resources and energy supply, and children's environmental health and safety risks, as these were dismissed from detailed analysis in the EA (see the beginning of EA Section 3.0). As defined by the FAA, the Proposed Action would not have a measurable effect on natural resources, such as water, asphalt, aggregate, or wood (see EA 3.11.4 at 3-44). The Proposed Action would not convert prime agricultural land to other uses or result in a decrease in the land's productivity (see EA 3.0 at 3-1). Given the location of SLC-20 and the activities proposed, the Proposed Action would not disproportionately affect children (see EA 3.0 at 3-1).

Air Quality

The Proposed Action is not considered to be a major source of air pollutants and does not require a Clean Air Act Title V permit. Brevard County is in attainment for all criteria pollutants; therefore, a General Conformity analysis is not required. Launch operations would result in emissions of carbon dioxide (CO₂), carbon monoxide, oxides of nitrogen (NO_x), and particulate matter. Emissions from nominal launches, catastrophic failures, or spills of liquid propellants are not expected to result in an exceedance of any National Ambient Air Quality Standards. Airspace and seospace closures associated with launches would result in additional aircraft and ship emissions primarily from re-routing and subsequently expending additional fuel. Any air emissions increase are not expected to result in an exceedance of a National Ambient Air Quality Standard for any criteria pollutant. Emissions from aircraft being re-routed would occur above 3,000 feet (the mixing layer) and thus would not affect ambient air quality. Therefore, the Proposed Action would not result in a significant impact on air quality (see EA 4.5 at 4-26).

Biological Resources (including Fish, Wildlife, and Plants)

Launches could have minor vegetation impacts near the launch pad associated with engine ignition, like previous actions at CCAFS. Any vegetation impacts are expected to be minimal. Noise generated during launches would startle wildlife in the vicinity of SLC-20. Night lighting during operation of the launch site and during launches is a concern because of the potential for sea turtle hatchlings at the beach to be drawn toward the lights instead of toward the surf. In compliance with 45 SWI 32-7001 (January 25, 2008), Space Florida would develop a Light Management Plan (LMP) that would be reviewed and approved by the 45 SW and U.S. Fish and Wildlife Service (USFWS) to avoid or minimize potential lighting effects to sea turtles. The 45 SW would monitor for strict adherence to the LMP to ensure effects (i.e., disorientation) are minimized.

The USAF conducted consultation with the USFWS per Section 7 of the Endangered Species Act (ESA) for the proposed project. The USAF prepared a Biological Assessment (BA) and submitted it to the USFWS on January 10, 2020; the USAF submitted a supplemental BA on March 5, 2020 after a request by USFWS (see EA Appendix D). The USAF determined that the proposed project *may affect but is not likely to adversely affect* the Florida scrub jay, wood stork, red knot, piping plover, eastern indigo snake, and manatee. The USFWS concurred with these determinations on February 10, 2020, and April 23, 2020 (see EA Appendix C). The USAF will control operations to meet prescribed fire management goals for managing habitat, and Space Florida will ensure tenants can accommodate specified prescribed burn days.

The USAF determined that the proposed project *may affect and is likely to adversely affect* the southeastern beach mouse and the loggerhead, green, leatherback, hawksbill, and Kemp's ridley sea turtles. For the five sea turtles, the USFWS concurred with USAF's effect determinations. The USFWS programmatically analyzed the effects of facility lighting adjacent to nesting marine turtle habitat and has exempted incidental take under a Biological Opinion (BO) (FWS Log No. 2009-F-0087). The 45 SW and Space Florida are responsible for implementing all the terms and conditions of this BO for nesting marine turtles.

For the southeastern beach mouse, the USFWS concurred with the USAF's effects determination and issued a BO on July 13, 2020 and has exempted incidental take (FWS Log No. 04EF10000-2020-F-0288; see EA Appendix C). In the July 2020 BO, the USFWS determined the project would not affect designated critical habitat and would not jeopardize the continued existence of the southeastern beach mouse. In the July 2020 BO, the USFWS determined no reasonable and prudent measures, and thus no terms and

conditions, are necessary or appropriate to minimize potential impacts on the southeastern beach mouse. However, the 45 SW is responsible for implementing a habitat enhancement project and for monitoring and reporting any impacts on the southeastern beach mouse, as stated in the BO (see BO Section 8.4).

During a nominal launch, the launch vehicle would fly over the coastal waters of the Atlantic Ocean and into orbit without impacts of any kind on marine life or habitat. In the case of an airborne launch termination (i.e., an anomaly), the launch vehicle would either impact the Atlantic Ocean essentially intact or break up into pieces and land in the ocean. The launch vehicle may be carrying unused portions of liquid fuels. Upon contact with water, the propellants would be quickly diluted and buffered by seawater. Thus, the potential for adverse effects to marine life is low. Debris from a launch failure or planned jettison of hardware has a small potential to adversely affect marine species and their habitats. For an impact to occur to marine life due to an anomaly over the ocean, the species would need to be present at or near the surface at the same time as the event. In August 2016, the FAA conducted ESA consultation with the National Marine Fisheries Service (NMFS) to address potential effects of waterborne landings of spacecraft and rocket components (including discarding stages in the ocean) on ESA-listed species and critical habitat in the Atlantic Ocean, including sea turtles, marine mammals, and fish. NMFS concluded that potential effects to ESA-listed species and critical habitat are discountable and/or insignificant and thus would not adversely affect ESA-listed species and critical habitat (see Appendix E).

In summary, the Proposed Action is not expected to result in significant impacts on biological resources (see EA 4.3 at 4-10 to 4-22).

Climate

Launch operations would emit greenhouse gases, including CO₂, N₂O, and CH₄. These emissions would be a small fraction of total U.S. emissions and would not cause any appreciable global warming that may lead to climate change. The Proposed Action is not expected to be impacted by sea level rise in the foreseeable future because of the launch complex's elevation. Airspace and seaspace closures associated with launches would result in additional aircraft and ship emissions mainly from re-routing and expending more fuel. The amount of time that affected aircraft and ships spend re-routing would be short-term. In addition, the number of aircraft and ships that would be impacted per launch would not

be expected to produce additional emissions that would have a notable impact on climate. Therefore, the Proposed Action is not expected to result in significant climate-related impacts (see EA 4.6 at 4-28).

Department of Transportation Act, Section 4(f)

Section 4(f) properties within an approximately 15-mile radius of SLC-20 would experience launch noise. The increased noise level would only last a few minutes and would occur up to 24 times a year under the Proposed Action. All pre-launch operations and effects would occur within or very close to the boundaries of SLC-20. Launch vehicles would be launched from SLC-20 and accelerate over the Atlantic Ocean and away from Section 4(f) resources. Section 4(f) properties near SLC-20 have been experiencing launch noise from CCAFS and adjacent Kennedy Space Center (KSC) for decades. Therefore, the FAA has determined the Proposed Action would not substantially diminish the use of the protected activities, features, or attributes of any of the Section 4(f) properties identified, and thus would not result in substantial impairment of the properties. The Proposed Action would not result in a use of any Section 4(f) property and would not invoke Section 4(f) of the DOT Act. Therefore, the Proposed Action would not result in significant impacts on Section 4(f) properties (see EA 4.15 at 4-42).

Hazardous Materials, Solid Waste, and Pollution Prevention

Launch operations would involve the use of products containing hazardous materials, including paints, solvents, oils, lubricants, acids, and batteries, which are routinely used at CCAFS. Hazardous materials such as propellants, ordnance, chemicals, and other hazardous material payload components would be transported to the facilities in accordance with Florida Department of Transportation regulations and would be handled and disposed of in accordance with the Resource Conservation and Recovery Act and the Occupational Safety and Health Administration. Solid waste would be expected to increase slightly with increased launch activities. The amount of solid waste generated would be handled under existing collection and disposal operations at CCAFS. Space Florida's tenants would develop a Pollution Prevention Management Plan, in coordination with 45 SW pollution prevention plans and goals, and comply with all federal, state, and local regulations. The Proposed Action is not expected to result in significant impacts related to hazardous materials, solid waste, and pollution prevention (see EA 4.7 at 4-29).

Historical, Architectural, Archeological, and Cultural Resources

In June 2019, the 45 SW Cultural Resources Manager (CRM) performed a Phase 1 cultural resource assessment (CRA) for the proposed project. The CRM did not identify any historical or cultural resource issues except for the Blockhouse, which is located at SLC-20. On September 12, 2019, in accordance with Section 106 of the National Historic Preservation Act, the State Historic Preservation Officer concurred with the findings of the CRM that the proposed project would not result in an adverse effect to historic properties (see EA Appendix F). As reported in the EA, there are no Tribal Cultural Resources present at CCAFS. Therefore, the Proposed Action would not result in significant impacts on historical, architectural, archeological, or cultural resources (see EA 4.4 at 4-23).

Land Use

The Proposed Action would not change the existing use of the land, which is designated for space launch activities. Operations would be consistent with the 45 SW General Plan and the USAF mission at CCAFS. Therefore, the Proposed Action would not result in significant impacts to land use (see EA 4.1 at 4-2).

Noise and Noise-Compatible Land Use

Increased noise levels in the area surrounding SLC-20 from launches would be of short duration and diminish quickly as the vehicle rises. Sonic booms generated during launches would be directed easterly out over the Atlantic Ocean. The boom would intercept the surface well offshore and would not be heard on land. Blue Ridge Research and Consulting, LLC (BRRRC) modeled launches to predict noise levels generated during launch (see EA Appendix B). The FAA's Office of Environment and Energy approved BRRRC's modeling methods. The modeled day-night average sound level (DNL) 65 and 60 A-weighted decibel contours extend approximately 1.2 and 1.8 miles from the launch pad, respectively. This area does not encompass land outside the boundaries of CCAFS and KSC, and, thus, no residences would be impacted. Based on BRRRC's analysis, the Proposed Action would not result in significant noise impacts (see EA 4.2 at 4-5).

Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

Launch operations would not impact the local population or the growth rate of the region. The Proposed Action would not affect the local housing market or the need for new social services or support facilities. The Proposed Action may generate a negligible positive economic impact on the region. Operations

would not result in the closure of any public airport or seaport during the operation nor so severely restrict the use of the surrounding airspace or seaspace as to prevent access to an airport or seaport for an extended period of time. Existing closures for launches are temporary and the FAA's previous analyses have concluded minor or minimal impacts on air travel and sea travel from launches. Therefore, the Proposed Action would not result in significant socioeconomic impacts (see EA 4.13 at 4-40).

The project area is not located adjacent to or near minority or low-income populations. The Proposed Action would not substantially affect human health or the environment and would not disproportionately affect any population group, including minority or low-income populations. Therefore, the Proposed Action would not result in significant impacts related to environmental justice (see EA 4.14 at 4-41).

As stated above, the Proposed Action would not affect children's environmental health and safety (see EA 3.0 at 3-1).

Visual Effects (including Light Emissions)

The existing and proposed facilities at SLC-20 are not visible by the public except from the ocean. The Proposed Action would not permanently change or degrade the existing visual character or quality of the site and its surroundings and is consistent with other activities that have occurred and currently occur at CCAFS. The visual sensitivity is low because CCAFS is located in industrialized areas. Space Florida would minimize potential lighting impacts through implementation of an LMP (see *Biological Resources* above). Therefore, the Proposed Action would not result in significant visual effects (see EA 4.1 at 4-3).

Water Resources (including Wetlands, Floodplains, Surface Waters, Groundwater, and Wild and Scenic Rivers)

The Proposed Action would not affect wetlands, floodplains, or wild and scenic rivers because these resources are not located at or near SLC-20 (see EA 4.8 at 4-31). The Proposed Action would not affect groundwater because launch operations would not use groundwater and would not affect groundwater quality (see EA 4.8 at 4-31).

Space Florida would contain launch deluge wastewater generated during engine testing and launch operations in new, separate deluge (impermeable concrete) basins. Space Florida would test the

collected water and then release it to the stormwater retention basins, or the water may be reused and pumped back to the storage tank. Any discharge to the ground surface would require an industrial wastewater permit from the Florida Department of Environmental Protection (FDEP) and require coordination with 45 SW. Space Florida would obtain all required permitting for stormwater discharge. Therefore, the Proposed Action is not expected to result in significant impacts on water resources (see EA 4.8 at 4-31).

Cumulative Impacts

The EA addresses the potential impacts of past, present, and reasonably foreseeable future activities at and within the vicinity of CCAFS that would affect the resources impacted by the Proposed Action. Due to the nature of the Proposed Action and its location on the coast within CCAFS, only launch-related actions occurring at CCAFS would meaningfully interact in time and space with the Proposed Action such that potential cumulative impacts could result. There is a reasonably foreseeable increase in future launch actions (government and commercial) at CCAFS and KSC. Launches occur days or weeks apart from each other and are often delayed due to technical issues. The cumulative effect of planned launches at CCAFS and KSC are not expected to result in significant cumulative environmental impacts (see EA 5.0 at 5-1 to 5-9).

Conditions and Mitigation

As prescribed by 40 CFR § 1505.3, the FAA shall take steps as appropriate to the action, through mechanisms such as the enforcement of licensing conditions, and shall monitor these as necessary to ensure that Space Florida and launch operators implement avoidance, minimization, and/or mitigation measures as set forth in Chapter 4 of the EA under various impact categories. The FAA has jurisdiction over FAA-licensed operations only and thus can only enforce measures that are related to licensed operations. The 45 SW is responsible for mitigation associated with construction. The avoidance, minimization, and mitigation measures include:

- Avoidance and minimization measures, as well as reporting requirements, identified in ESA consultations with USFWS; and
- Handling hazardous materials, hazardous wastes, and solid wastes in accordance with all relevant federal, state, and local regulations pertaining to these substances.

Agency Finding and Statement

The FAA has determined that no significant impacts would occur as a result of the Proposed Action and, therefore, that preparation of an EIS is not warranted and a FONSI in accordance with 40 CFR § 1501.6 is appropriate.

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed federal action is consistent with existing national environmental policies and objectives as set forth in Section 101 of NEPA and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA.

APPROVED: **DANIEL P MURRAY**  Digitally signed by DANIEL P MURRAY
Date: 2021.06.30 19:42:10 -04'00' DATE: _____

Daniel Murray
Executive Director, Office of Operational Safety